MEDTRONIC Sofamor Danek PYRAMID® +4 Anterior Lumbar Plate System 510(k) Summary January 2008

I. Company:

Medtronic Sofamor Danek, Inc.

1800 Pyramid Place

Memphis, Tennessee 38132

(901) 396-3133

Contact:

Lila Joe

Associate Regulatory Affairs Specialist

II. Product Name: PYRAMID® +4 Anterior Lumbar Plate System

Classification Name:

Spinal Intervertebral Body Fixation Orthosis

Class II

Product Code: KWQ

21 CFR:

888.3060

- III. Description: The subject device represents an expansion of the PYRAMID® +4
 ANTERIOR LUMBAR PLATE System. This system consists of a series of 3-hole and
 4-hole plates as well as bone screws in a variety of sizes. The 3-hole plates are intended
 for use as an anterior fixation device while the 4-hole plates are intended for use as an
 anterior lateral fixation device. The system incorporates a locking mechanism to prevent
 the bone screws from backing out by covering the bone screw heads. Like its predicate
 counterpart, the subject device is intended for use as an anterior fixation device to
 supplement an anterior lumbar interbody fusion. The variety of the PYRAMID® +4
 ANTERIOR LUMBAR PLATE System provides surgeons with options in the placement
 of the device to avoid interference with the vasculature, while still allowing for fixation.
 The PYRAMID® +4 ANTERIOR LUMBAR PLATE components are made of titanium
 alloy.
- Indications for Use: The Medtronic Spinal and Biologics PYRAMID® +4 ANTERIOR LUMBAR PLATE Fixation System is indicated for use as a supplemental fixation device for the lumbosacral level, anterior below the bifurcation (L5-S1) of the vascular structures or anterior lateral above the bifurcation (L1-L5) of the vascular structures. When properly used, this system will help provide temporary stabilization until a solid spinal fusion develops. Specific indications include: 1) Degenerative disc disease (as defined by back pain of discogenic origin with degeneration of the disc confirmed by history and radiographic studies); 2) Pseudoarthrosis; 3) Spondylolysis; 4)

Spondylolisthesis; 5)Fracture; 6) Neoplastic disease; 7) Unsuccessful previous fusion surgery; 8) Lordotic deformities of the spine; 9) Idiopathic thoracolumbar or lumbar scoliosis; 10) Deformity (i.e., scoliosis, lordosis, and/or kyphosis) associated with deficient posterior elements such as that resulting from laminectomy, spina bifida, or myelomenigocele; and/or 11) Neuromuscular deformity (i.e., scoliosis, lordosis, and / or kyphosis) associated with pelvic obliquity.

V. <u>Substantial Equivalence</u>: Documentation, including mechanical test results, provided has demonstrated that the PYRAMID[®] +4 Anterior Lumbar Plate System is substantially equivalent to similar previously cleared devices such as the PYRAMID® Anterior Plate Fixation System (K013665, SE 12/29/2002) and PYRAMID ® +4 Anterior Lumbar Plate System (K071416, SE 11/1/2007).



Food and Drug Administration 9200 Corporate Boulevard Rockville MD 20850

APR 3 0 2008

Medtronic Sofamor Danek USA, Inc. % Ms. Michelle Willis 1800 Pyramid Place Memphis, TN 38132

Re: K080429

Trade/Device Name: PYRAMID® +4 Anterior Lumbar Plate System

Regulation Number: 21 CFR 888.306

Regulation Name: Spinal intervertebral body fixation orthosis

Regulatory Class: Class II Product Code: KWQ Dated: April 11, 2008 Received: April 14, 2008

Dear Ms. Willis:

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act) that do not require approval of a premarket approval application (PMA). You may, therefore, market the device, subject to the general controls provisions of the Act. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to such additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 898. In addition, FDA may publish further announcements concerning your device in the <u>Federal Register</u>.

Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the Act's requirements, including, but not limited to: registration and listing (21 CFR Part 807); labeling (21 CFR Part 801); good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820); and if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR 1000-1050.

Page 2 – Ms. Michelle Willis

This letter will allow you to begin marketing your device as described in your Section 510(k) premarket notification. The FDA finding of substantial equivalence of your device to a legally marketed predicate device results in a classification for your device and thus, permits your device to proceed to the market.

If you desire specific advice for your device on our labeling regulation (21 CFR Part 801), please contact the Center for Devices and Radiological Health's (CDRH's) Office of Compliance at (240) 276-0120. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21 CFR Part 807.97). For questions regarding postmarket surveillance, please contact CDRH's Office of Surveillance and Biometric's (OSB's) Division of Postmarket Surveillance at (240) 276-3474. For questions regarding the reporting of device adverse events (Medical Device Reporting (MDR)), please contact the Division of Surveillance Systems at (240) 276-3464. You may obtain other general information on your responsibilities under the Act from the Division of Small Manufacturers, International and Consumer Assistance at toll-free number (800) 638-2041 or (240) 276-3150 or the Internet address http://www.fda.gov/cdrh/industry/support/index.html.

Sincerely yours,

Mark N. Melkerson

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Director

Division of General, Restorative and Neurological Devices Office of Device Evaluation Center for Devices and Radiological Health

Enclosure

510(k) Number (if known): <u>\$\delta \delta \d</u>
Device Name: PYRAMID® +4 Anterior Lumbar Plate System
Indications for Use:
The Medtronic Spinal and Biologics PYRAMID® +4 ANTERIOR LUMBAR PLATE Fixation
System is indicated for use as a supplemental fixation device for the lumbosacral level, anterior
below the bifurcation (L5-S1) of the vascular structures or anterior lateral above the bifurcation
(L1-L5) of the vascular structures. When properly used, this system will help provide temporary
stabilization until a solid spinal fusion develops. Specific indications include: 1) Degenerative
disc disease (as defined by back pain of discogenic origin with degeneration of the disc
confirmed by history and radiographic studies); 2) Pseudoarthrosis; 3) Spondylolysis; 4)
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Lordotic deformities of the spine; 9) Idiopathic thoracolumbar or lumbar scoliosis; 10) Deformity
(i.e., scoliosis, lordosis, and/or kyphosis) associated with deficient posterior elements such as
that resulting from laminectomy, spina bifida, or myelomenigocele; and/or 11) Neuromuscular
deformity (i.e., scoliosis, lordosis, and/or kyphosis) associated with pelvic obliquity.
Prescription Use X AND/OR Over-The-Counter Use (Part 21 CFR 801 Subpart D) (21 CFR 807 Subpart C)
(PLEASE DO NOT WRITE BELOW THIS LINE-CONTINUE ON ANOTHER PAGE IF NEEDED)
Concurrence of CDRH, Office of Device Evaluation (ODE)
(Division Sign-Off)
(Division Sign-Uii)
Division of General, Restorative,
and Neurological Devices

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510(k) Number K080429